

Director Dale Hall's Statement

Public Hearing regarding the Navy's Proposed Outlying Landing Field in Northeastern North Carolina on March 19, 2007

Good Evening. I am Dale Hall, Director of the U.S. Fish and Wildlife Service. We are the principal Federal agency responsible for conserving, protecting and enhancing fish, wildlife and plants and their habitats for the continuing benefit of the American people.

To meet that mission, we manage the 95-million-acre National Wildlife Refuge System, which encompasses 547 national wildlife refuges. We also operate 69 national fish hatcheries, 64 fishery resources offices and 81 ecological services field stations. We enforce federal wildlife laws, administer the Endangered Species Act, manage migratory bird populations, restore nationally significant fisheries, conserve and restore wildlife habitat such as wetlands, and help foreign and Native American tribal governments with their conservation efforts.

We also oversee the Federal Assistance program, which distributes hundreds of millions of dollars in excise taxes on fishing and hunting equipment to state fish and wildlife agencies.

Eleven of our National Wildlife Refuges are located in North Carolina, comprising over 400,000 acres of habitat for our nation's wildlife. The Navy's preferred site for building a new Outlying Landing Field is next to one of those refuges-Pocosin Lakes National Wildlife Refuge, which was established in 1963 as the Pungo National Wildlife Refuge to benefit migratory birds and expanded in 1990 to include Pocosin Lakes. Another alternative site is near Lake Mattamuskeet Refuge just down the road from here.

These two refuges are particularly significant for the sanctuary they provide for hundreds of thousands of migratory waterfowl, as well as other wildlife including bears, bobcats, and the only wild population of the endangered red wolf. These refuges are also special places to the American people, and every year thousands of people come to eastern North Carolina to visit the refuges and

enjoy the sights and sounds of our nation's natural heritage.

The Fish and Wildlife Service has been involved in the review of the OLF proposal since its inception, and has been a cooperating agency in the preparation of the draft Supplemental Environmental Impact

Statement. My agency will be submitting written comments through the Department of the Interior in the next few weeks, but I felt it was important tonight to publicly explain our role as a cooperating agency, and to underscore our outstanding concerns about the effects of locating such a facility in close proximity to a National Wildlife Refuge.

Our role as a cooperating agency is to provide data, information and analysis relative to our expertise as wildlife biologists and federal land managers. The Navy has incorporated much of the input we have provided into the draft Supplemental EIS, and we appreciate the degree to which you have been responsive to our concerns to date.

However, our role as a cooperating agency does not mean that we agree with all the findings contained in the draft Supplemental EIS. Indeed, we continue to have many concerns regarding the potential effects of locating an OLF in close proximity to a National Wildlife Refuge. We agree that the Navy has assembled all the available data and relevant history of which we are aware. We do not disagree with the Navy's characterization of the underlying science. However, we are concerned that the conclusions the Navy has drawn are



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more definitive than the data can support. Indeed it is our overarching concern that the limitations of the available information leaves a large degree of uncertainty regarding the true magnitude of effects to the resources we are charged with managing on behalf of the public.

Our concerns center on the loss of foraging habitat for wintering waterfowl; the effects of aircraft noise on waterfowl; and the cumulative impacts of these and other effects on historic waterfowl use patterns. We also have concerns about the effects of the facility on our ability to manage and monitor wildlife resources on and around the refuges; the effects of the facility on the endangered red wolf population; and, lastly, the effects of aircraft noise on the integrity of the refuge and the experience of visitors.

I would like to address each of these concerns in more detail.



Loss of Foraging Habitat

Site C is located about six miles from the Pungo Unit of Pocosin Lakes National Wildlife Refuge, which is a 12,500 acre designated Globally Important Bird Area. As such, the American Bird Conservancy has designated this area as exceptionally important – even essential – for bird conservation. More than 100,000 waterfowl, including 20,000 to 30,000 tundra swans and 75,000 to 80,000 snow geese, winter here. This represents 27% of the entire Atlantic Flyway population of tundra swans. We see high concentrations of waterfowl in and around the Pungo Unit for five to six months each year, and birds that roost here depend on the surrounding agricultural lands for foraging habitat.

To manage the known Bird Aircraft Strike Hazard at Site C, the Navy proposes to allow only crops unattractive to waterfowl, to use harassment techniques, and, as a last resort, to use lethal control methods in the vicinity of the runway. In its Draft Supplemental EIS, the Navy stated that land management of the 30,000 acres at Site C would reduce its attractiveness to migratory waterfowl and result in the loss of potential foraging habitat. The Navy's stated goal is to force the birds to shift to other foraging areas. We believe this will disrupt historic wintering waterfowl use patterns and permanently remove traditional wintering areas. In its Draft SEIS, the Navy determined this would cause moderate impacts to the distribution of waterfowl and the availability of habitat within a 20-mile radius of the OLF Site C would be sufficient to support re-distribution of waterfowl. We respectfully disagree.

The Service is concerned that the Navy's analysis did not adequately evaluate the availability of remaining croplands within the 20-mile radius study area to determine the effects of the loss of cropland foraging habitat at Site C. The availability of croplands as foraging habitat is affected by factors such as crop type, field size, location, and proximity to woods and treelines, among others. As a result, the Service recommended that potential forage acre values within the 20-mile radius study area be corrected for availability. This recommendation was not accepted. The Service notes the limitation of the foraging habitat analysis as depicted in the Draft Supplemental EIS, and remains concerned given those limitations that the true impacts of those effects are uncertain.

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Effects of Aircraft Noise

Noise disturbance, especially at the roost sites on the refuge, continues to be a concern for the Service. Based on noise modeling and simulated flights, the Navy has concluded in the Draft SEIS there will be little increase in noise at Pungo Lake, and that the effects on waterfowl associated with this increase would be minor.

We anticipate the noise from the jets utilizing the OLF will be clearly audible on the refuge. Although the Navy conducted a simulation to evaluate the effects of noise on waterfowl, its tests involved only one jet in the pattern. Our observation was that even with only one jet in the pattern, the test flight noise was pronounced, especially at night and early morning, and in sharp contrast to the natural sounds made by waterfowl on Pungo Lake. The frequency of these noise events during actual training and the duration of exposure to noise events will be very different from those experienced during the simulations conducted. In addition, the character of the noise generated by operations at the OLF will be fundamentally different from the existing noise around Pungo Lake and could have a very different effect on the organisms hearing them. As a result, we recommended the Navy utilize a more realistic simulation scenario utilizing more than one jet, and that they also evaluate not only behavioral responses but physiological responses as well. These recommendations were not accepted.

The Navy's Noise Response Evaluations for Site C concluded that tundra swans and snow geese showed a low to moderate short term response level to jet aircraft noise. The report also states that "whether these more frequent noise events during a training session and the existence of training sessions

possibly throughout the overwintering season over many years would have a cumulative effect on waterfowl responses, or whether waterfowl would be more likely to habituate to the aircraft noise, cannot be fully determined through this evaluation."

The Service contends that the long-term impacts of noise on waterfowl could impact the core mission of Pocosin Lakes NWR, and that given the study limitations, the true impacts are uncertain, not minor as stated in the Draft SEIS.

Cumulative Impacts

The Service is concerned about the cumulative impacts of the loss of foraging habitat and noise on waterfowl, in combination with other changes in the landscape, and for the continued integrity of Pocosin Lakes National Wildlife Refuge. We are concerned that the combination of the loss of foraging habitat and new noise disturbances from the OLF has the potential to cause significant numbers of waterfowl to stop wintering in and around the refuge. This would be inconsistent with the purposes for which this refuge was established and would compromise the integrity of the refuge, which was specifically set aside as a sanctuary for migrating and wintering waterfowl in the Atlantic Flyway.

The draft SEIS provides some discussion of potential measures to "mitigate" the environmental and social effects of the OLF. However, with respect to waterfowl and waterfowl habitat,

mitigation measures are targeted solely at reducing the Bird / Aircraft Strike Hazard. While we agree this is vitally important, we note that no measures are proposed to offset the adverse impacts to waterfowl or waterfowl habitat that are anticipated as a result of the construction and operation of the OLF aside from the Navy's efforts to shift the flight paths at Site C to the west.

Ability to Manage Refuge Resources

The Service conducts aerial surveys of migratory waterfowl, and conducts other airborne management activities such as other wildlife surveys, law enforcement, and wildfire detection and suppression. These aerial surveys are necessary to collect data needed to make scientifically-based decisions integral to the management of the refuge and its wildlife. The Service currently manages the red wolf population using data collected from twice weekly aerial surveys. The draft SEIS acknowledges that control of the Class D airspace around the OLF site may require rerouting of our Fish and Wildlife Service aircraft. While the Navy characterizes this as an "occasional" need, we remain concerned about the frequency such actions will be required and the resulting effects these restrictions will have on our ability to manage the refuge and wildlife.

Effects to Red Wolves

The only wild population of endangered red wolves exists in eastern North Carolina, including on and adjacent to Site C. The population is classified as experimental, non-essential under the Endangered Species Act. We are currently consulting with the Navy regarding the effects of the proposed facility on red wolves, and we are confident that many effects can be minimized. Nonetheless, we note that other alternative sites for an Outlying Landing Field would have no effects at all to red wolves.

Effects on Refuge Visitor Experience

The NWR System Improvement Act of 1997 (Act) states that the Secretary of Interior shall "ensure that the biological integrity, diversity and environmental health of the National Wildlife Refuge System are maintained for the benefit of present and future generations of Americans." The Act further emphasizes that compatible wildlife dependent recreational uses involving hunting, fishing, wildlife observation and photography, and environmental



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education and interpretation are the priority public uses of the Refuge system. The ability for the public to visit and engage in these wildlife dependent recreational uses is a core mission for our refuges, and in the case of Pocosin Lakes National Wildlife Refuge, is integral to its integrity. The Navy acknowledges in the Draft SEIS that visitors to a national wildlife refuge have an "increased expectation of an unmasked natural soundscape."

We agree, and note that during the overflight tests conducted by the Navy, participating Fish and Wildlife Service personnel could easily hear the roar of the FA-18 Superhornet engines on the refuge. More than 30,000 Americans visit Pocosin Lakes National Wildlife Refuge annually to enjoy the natural sights and sounds on the refuge, to hunt, to fish, take pictures, to watch and to learn about wildlife and the environment. The unnatural noise that will be present as a result of flight operations at the OLF will most certainly disrupt the intended visitor experience of peaceful solitude in nature, has the very real potential to result in reductions in refuge visitation, and could thereby further compromise the integrity of the refuge.

In reviewing the information available about all the potential sites for an Outlying Landing Field, we recognize that there will be social and environmental impacts to some degree at any site chosen for this important facility. Make no mistake; we fully support the

Navy's efforts to construct an Outlying Landing Field to meet its national defense mission. We continue to note that other sites in North Carolina have been identified within the Draft SEIS where the proposed OLF could be constructed, with far fewer risks to the resources we are charged with managing on behalf of the public.

In closing, I would like to read to you a comment from a school teacher who recently visited Pocosin Lakes National Wildlife Refuge as part of an annual "Educator Trek." The teacher said: "I got to experience a quiet, cold sunrise over untamed land; to see a mile long flock of red-winged blackbirds; to hear the raucous voices of thousands of birds on Pungo Lake; to walk where deer, bobcat, bear, opossum, and raccoons had walked; to see majestic bald eagles; to partake in an extraordinary sunset while watching thousands of birds flying overhead."

This statement illustrates perfectly what a national wildlife refuge is all about. Americans value wildlife and wild places for their beauty and solitude. It is our mission to protect those values for the continuing benefit of the American people, and for that reason we remain concerned about the effects of the proposed OLF on our nation's fish and wildlife resources.

Thank you for the opportunity to speak tonight, and we look forward to continuing to work with the Navy to address these issues.